



## South Dayton - Ohio's Summary of Remaining Issues

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Cc: "Allen, Mark", "Starkey, Mike", "Whitehouse, Peter", "Hafner, Cindy", "Marshall, Laura"

Joan,

As you have requested, Ohio EPA is providing you with an inclusive summary of our opinions/concerns based on the information we have to date:

1) We continue to have concerns regarding reliable containment of the Ottoson Solvents Drum Area and believe this area should be evaluated further during the OU-1 FS. The results of that evaluation should allow us to determine if the area constitutes a hot spot (as we maintain), in which case we would recommend it be evaluated for treatment and/or removal.

2) For the OU-1 cap, we would support selection of a Matcon cap with a minimum 1.5% slope for business areas and a hazardous waste cap with a minimum 3% slope for vacant areas.

3) For the OU-1 landfill gas system (LFG), we would support selection of a fully penetrating active LFG and soil vapor extraction system with treatment of the extracted gas, as may be practicable, and/or as required by ARARs.

4) Regarding the presumptive remedy components of source area groundwater/leachate control:

We have concluded that the best approach would be to incorporate these controls into the OU-1 RI/FS Report and OU-1 Proposed Plan and ROD. However, if this is not possible, collection of the related data during the OU-1 RD (or sooner) could work assuming the following:

- a. one of the objectives of the OU-1 RD data collection effort is to collect all data deemed necessary to evaluate and select source area groundwater/leachate controls;
- b. the groundwater investigation focuses on distinguishing site-related contamination from non-site related contamination, rather than distinguishing contamination by depth; and
- c. the evaluation, selection, and implementation of these controls follows the streamlined presumptive remedy process, progressing on a schedule independent of the schedule for OU-2's "conventional" RI/FS.

5) For the source area groundwater/leachate controls, we would need to be able to review the proposed approach before we could provide comments or concerns. It is likely we would want to revisit potential hot spot sources of groundwater contamination if we conclude such controls may not be effective.

6) Our comfort with the above depends on the ability of the agencies to resolve any issues related to the OU-1 RI/FS Report and with components of the OU-1 remedy. Since we have not seen the report or the proposed plan, we cannot assure you that there will not be any other OU-1 issues.

7) For OU-2, we would need to see the OU-2 RI/FS work plan and OU-2 RI/FS Report before we could

provide comments or concerns.

We hope this gives you what you need at this point, and as always, we can set up another call to discuss further. Thanks for your time!

Tiffani Kavalec, Manager

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